

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
BEFORE THE
BONNEVILLE POWER ADMINISTRATION**

2022 Joint Power and Transmission Rate
Proceeding

BPA Docket No. BP-22

**NORTHWEST & INTERMOUNTAIN
POWER PRODUCERS COALITION
PETITION TO INTERVENE**

Pursuant to the notice appearing in the Federal Register Vol. 85, No. 231 on December 1, 2020, and Rule 1010.6 of the Bonneville Power Administration's ("BPA") Rules of Procedure (September 12, 2018), the Northwest & Intermountain Power Producers Coalition ("NIPPC") respectfully petitions to intervene as a party in this proceeding. NIPPC's concerns relate to Power Rate Schedules and Transmission Rate Schedules proposed for the BP-22 rate period. In support of this request, NIPPC states as follows:

I. PETITION TO INTERVENE IN BP-22

NIPPC is a not-for-profit trade association that advocates for competition in the power sector. NIPPC's members include independent power producers who develop and operate power plants, power marketers, and independent transmission companies. NIPPC members have collectively invested billions of dollars in existing generation resources in the United States and have substantial operating assets in the Northwest along with renewable and thermal projects in advanced stages of development, many of which are tied to or rely on BPA's transmission system for access to power markets.

Under BPA's rules, NIPPC has the right to intervene because "[e]ntities that directly purchase power or transmission services under Bonneville's rate schedules, or trade organizations representing those entities, will be granted intervention."¹ In addition, NIPPC's intervention in this proceeding is in the public interest. NIPPC's interests will not be adequately represented by any other party. Therefore, NIPPC respectfully requests that this petition to intervene be granted.

II. COMMUNICATIONS

Communication in connection with this filing should be addressed to:

Spencer Gray
Executive Director
NIPPC
P.O. Box 504
Mercer Island, WA 98040
Telephone: (503) 482-9191

Irion Sanger
Sanger Law, PC
1041 SE 58th Place
Portland, OR 97215
Telephone: (503) 756-7533
Fax: (503) 334-2235
Email: bpadockets@sanger-law.com

Henry Tilghman
Consultant to NIPPC
Tilghman Associates
1816 NE 53rd Ave
Portland, OR 97213
Telephone: (503) 702-3254
Email: hrt@tilghmanassociates.com

Dina Dubson Kelley
Sanger Law PC
1041 SE 58th Place
Portland, OR 97215
Telephone: (503) 975-7661
Fax: (503) 334-2235
Email: bpadockets@sanger-law.com

Erin Yoder Logue
Sanger Law, PC
1041 SE 58th Place
Portland, OR 97215
Telephone: (774) 265-0261
Fax: (503) 334-2235
Email: bpadockets@sanger-law.com

III. CONCLUSION

For the reasons stated herein, NIPPC respectfully requests that it be allowed to intervene

¹ Rule 1010.6(b).

in the BP-22 proceeding as a party.

DATED this 4th day of December, 2020.

Respectfully submitted

/s/ Irion Sanger

Irion Sanger
Sanger Law PC